

FILED

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IN THE UNITED STATES DISTRICT COURT

CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
YOUNGSTOWN

FOR THE NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ILIJJA JOSIPOVIC,

Defendant.

INFORMATION

CASE NO. 5:17 CR  
18 U.S.C. § 1546(a)

0032

**JUDGE PEARSON**  
**MAG. JUDGE BURKE**

COUNT 1

The United States Attorney charges:

On or about February 1, 2012, in the Northern District of Ohio, Eastern Division, the defendant, ILIJJA JOSIPOVIC, did knowingly possess and use an alien registration receipt card, that is a Permanent Resident Card bearing Alien registration number 079-927-323 in the name Ilija Josipovic, which the defendant knew to be procured by means of a false claim and statement or otherwise procured by fraud or unlawfully obtained, to wit: JOSIPOVIC used and possessed an alien registration receipt card while obtaining an Ohio driver's license at the Ohio Bureau of Motor Vehicles office 7744, located at 1030 East Tallmadge Avenue, Akron, Ohio, knowing he had fraudulently entered the United States as a refugee and thereafter fraudulently obtained permanent resident status and the alien registration receipt card by knowingly making:

- (a) a false statement, on or about June 6, 2002, on Form I-590 (Registration for Classification as Refugee) by omitting and failing to disclose his military service in the 6th Battalion, Zvornik Infantry Brigade, Army of Republika of Srpska, which began on or about May 25, 1992, and continued until approximately 1996;

- (b) a false statement, on or about June 4, 2004, on Form I-485 (Application to Register Permanent Resident or Adjust Status) by omitting and failing to disclose his military service in the 6th Battalion, Zvornik Infantry Brigade, Army of Republika of Srpska, which began on or about May 25, 1992, and continued until approximately 1996; and
- (c) a false statement, on or about June 4, 2004, on Form I-485 (Application to Register Permanent Resident or Adjust Status) by replying in the negative to question 10, asking if JOSIPOVIC had, by fraud or willful misrepresentation of a material fact, ever sought to procure, or procured, a visa, other documentation, entry in the U.S. or any immigration benefit;

in violation of Title 18, United States Code, Section 1546(a).

COUNT 2

The United States Attorney further charges:

On or about September 10, 2014, in the Northern District of Ohio, Eastern Division, the defendant, ILIJA JOSIPOVIC, did knowingly possess an alien registration receipt card, that is a Permanent Resident Card bearing Alien registration number 079-927-323 in the name Ilija Josipovic, which the defendant knew to be procured by means of a false claim and statement or otherwise procured by fraud or unlawfully obtained, to wit: JOSIPOVIC possessed an alien registration receipt card while at his residence on Argonne Avenue, Akron, Ohio, knowing he had fraudulently entered the United States as a refugee and thereafter fraudulently obtained permanent resident status and the alien registration receipt card by knowingly making:

- (a) a false statement, on or about June 6, 2002, on Form I-590 (Registration for Classification as Refugee) by omitting and failing to disclose his military service

in the 6th Battalion, Zvornik Infantry Brigade, Army of Republika of Srpska, which began on or about May 25, 1992, and continued until approximately 1996;

- (b) a false statement, on or about June 4, 2004, on Form I-485 (Application to Register Permanent Resident or Adjust Status) by omitting and failing to disclose his military service in the 6th Battalion, Zvornik Infantry Brigade, Army of Republika of Srpska, which began on or about May 25, 1992, and continued until approximately 1996; and
- (c) a false statement, on or about June 4, 2004, on Form I-485 (Application to Register Permanent Resident or Adjust Status) asking if JOSIPOVIC had, by fraud or willful misrepresentation of a material fact, ever sought to procure, or procured, a visa, other documentation, entry in the U.S. or any immigration benefit;

in violation of Title 18, United States Code, Section 1546(a).

CAROLE S. RENDON  
United States Attorney

By:

  
ROBERT E. BULFORD  
Attorney in Charge, Criminal Division  
Akron Branch Office